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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DOUGLAS TWEEDY,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:19-cv-00853-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to file his Cross-Motion to Affirm in response to Plaintiff's Motion for Reversal and Remand (Dkt. No. 18, filed on October 17, 2019), currently due on November 18, 2019, by 30 days, through and including December 18, 2019. Defendant further requests that all subsequent deadlines set forth in the Scheduling Order (Dkt. No. 15) be extended accordingly.

This is Defendant's first request for an extension of time to respond to Plaintiff's motion. Defendant requests this extension because of the workload of Defendant's attorney assigned to this case. Since Plaintiff's motion was filed, the undersigned counsel has worked on over 20 district court

1 cases, as well as a Ninth Circuit appeal. Counsel is also responsible for other substantive non-
2 litigation matters within the Office of General Counsel. This request is made to allow counsel
3 additional time to review the record, to evaluate the numerous issues raised in Plaintiff's motion, to
4 determine whether options exist for settlement, and if not, to prepare Defendant's cross-motion. This
5 request is made in good faith and with no intention to unduly delay the proceedings.

6 Counsel for Defendant conferred with Plaintiff's counsel on November 13, 2019, who
7 indicated no opposition to the requested extension.

8 It is therefore respectfully requested that Defendant be granted an extension of time to respond
9 to Plaintiff's motion, through and including December 18, 2019.

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11 Dated: November 13, 2019

Respectfully submitted,

12 NICHOLAS A. TRUTANICH
13 United States Attorney

14 /s/ Allison J. Cheung
15 ALLISON J. CHEUNG
Special Assistant United States Attorney

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18 IT IS SO ORDERED:

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20 HON. DANIEL J. ALBREGTS
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: November 15, 2019
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CERTIFICATE OF SERVICE

I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** on the date, and via the method of service, identified below:

CM/ECF:

Melissa A. Palmer
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Hal Taylor
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Dated: November 13, 2019

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney